



March 1, 2019

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Via ECFS

Accepted / Filed

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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Federal Communications Commission
Office of the Secretary

Re: *Connect America Fund – Alaska Plan*, WC Docket No. 16-271, Required Network Mapping Submission

Dear Ms. Dortch:

As a participant in the Alaska Plan, ASTAC Wireless, LLC. ("ASTAC") must file maps depicting portions of their microwave and fiber networks and associated nodes. This year's filing is due to be filed in the USAC HUBB by March 1, 2019.

The filing instructions adopted by the Wireline Competition and Wireless Telecommunications Bureaus require that the location information be accurate to within 7.6 meters at a 95 percent confidence level consistent with FGDC-STD-007, 3-1998. The instructions also require that an officer of the company certify that the information is accurate and complete.¹

The Alaska Telecom Association filed a petition for waiver of the 7.6 meter accuracy standard with regard to the buried and aerial fiber that must be reported and also submitted an alternative proposal.² The waiver remains pending. ASTAC wishes to comply to the fullest extent possible with the requirement to file its network location information by today's deadline but cannot certify that all buried and aerial fiber information is locationally accurate to the specified standard. Because ASTAC is unable to make the certification, it is also unable to submit its filing via USAC's HUBB.

¹ See *Connect America Fund – Alaska Plan*, Order on Reconsideration, 33 FCC Rcd. 2068, 2081-87 (Wireline Comp. & Wireless Telecomm'n's Burs. 2018) ("Network Mapping Instructions").

² See Petition for Limited Waiver of Alaska Telecom Association To Permit Commonly Accepted Industry Levels of Spatial Accuracy for Middle Mile Route Mapping, WC Docket No. 16-271 (filed Feb. 6, 2019); Letter from Christine O'Connor, Alaska Telecom Association, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 16-271 (filed Feb. 19, 2019) (proposing a standard of 50 meters and 80% confidence for buried and aerial fiber).

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Page 2 of 2

In an effort to ensure that the Bureaus have ASTAC's network information in a timely way and to comply with the mapping requirement to the fullest extent possible, ASTAC submits on the attached DVDs the information it would have filed in the HUBB. ASTAC requests confidentiality for the information on the DVDs, which the Bureaus already found likely to be confidential and subject to an abbreviated means for requesting confidentiality consistent with 47 C.F.R. § 0.459(a)(4).³

As an officer of ASTAC Wireless, LLC, I certify that the links depicting aerial and buried fiber are accurate to within 50 meters to an 80 percent confidence level. I also certify that all other information is accurate to within 7.6 meters to a 95 percent confidence level.

Please contact me should you have any questions.

Respectfully submitted,



Clover McNeil
Chief Financial Officer
ASTAC Wireless, LLC.
4300 B Street Suite 501
Anchorage, AK 99503

cc: Jesse Jachman
Ying Ke
Jonathan Lechter
Alex Minard
Matthew Warner

³ See Network Mapping Instructions at 2082 ("The location of companies' links and nodes are likely to contain confidential data. Accordingly, this data filing will use an abbreviated means to allow submitters to request confidentiality, consistent with 47 CFR § 0.459(a)(4). Filing material for this data collection will be deemed to be a request under section 0.459 that the material not be made publicly available.").